

ATTACHMENT A
Statement of Facts

The parties hereby stipulate and agree that if this case proceeded to trial, this Office would have proven the following facts beyond a reasonable doubt. They agree that these are not all of the facts that would be proved if this case proceeded to trial.

At all relevant times to this case, **ROY DAVID EVANS JR. ("EVANS")** was a citizen of the United States and a resident of Essex (Baltimore County), Maryland.

As early as 2014, **EVANS** posted advertisements on Craigslist, using email address roddanger86@yahoo.com, seeking young girls and asking for their age and photographs. Examples of such posts include: (1) "Wanting a young girl who needs to earn a little \$\$ tonight . . . Only have till 930pm so send me a pic of you and be ready to meet up!!! Thanks" and (2) "Looking for younger females who want to meet up!!! Email me your age, pics and location or just Kik me at roddanger86. Nice and humid today . . . Please be in good shape and good looking . . . Younger the better! Thanks."

In June 2015, Victim 1, a 14-year old female, replied to a Craigslist advertisement posted by **EVANS** in which he solicited "young models" and encouraged the females to contact the Craigslist poster on his Kik account "Roddanger86." Victim 1 contacted **EVANS** through email and Kik. **EVANS** asked Victim 1 her age, and Victim 1 stated that she was 14 years-old. **EVANS** told Victim 1 he was 27 years old when, in fact, he was 32 years old. **EVANS** and Victim 1 frequently communicated through Craigslist using Craigslist messenger, emails, cellular phone, and Kik.

Count Two

Pursuant to the investigation, law enforcement executed a search warrant on **EVANS'** email account, roddanger86@yahoo.com. Between August 26, 2015 and October 5, 2015, **EVANS** sent multiple videos and images of Victim 1 from either his roddanger86@yahoo.com or his evs003@yahoo.com email account to his roddanger86@yahoo.com account.

For example, on August 26 and 27, 2015, **EVANS** sent images/videos of Victim 1 to himself. Specifically, on September 13, 2015 at approximately 10:55 am, **EVANS** sent an email to "Roddanger86@yahoo.com" containing two videos and one image of Victim 1. In one video, which is 29 seconds long, Victim 1 penetrates her vagina using the handle of a lint roller. The camera view is on Victim 1's buttocks. In the other video, which is not child pornography, Victim 1 is performing fellatio on the handle of the lint brush.

On September 13, 2015, at approximately 11:01 am, **EVANS** sent an email to "Roddanger86@yahoo.com" containing three video attachments. In one video, Victim 1 is digitally penetrating her vagina. In the second video, Victim 1 undresses and then digitally penetrates her vagina. In the third video, Victim 1 digitally penetrated her vagina.

AS/R

On September 13, 2015, at approximately 11:01 am, **EVANS** sent an email to "Roddanger86@yahoo.com" containing four video attachments. The first video is Victim 1's face, and is not child pornography. The second, third and fourth video depict Victim 1 penetrating her vagina with the handle of a lint brush.

On September 14, 2015, **EVANS** sent an email to "Roddanger86@yahoo.com" containing one video attachment, which depicts Victim 1's full body and face, followed by her digitally penetrating her vagina.

Also, on September 28, 2015, **EVANS** sends multiple emails to "Roddanger86@yahoo.com" each containing videos of Victim 1 engaging in sex acts constituting child pornography. And, on October 5, 2015, he sends an email with subject "Asia 12" with five videos depicting Victim 1 penetrating her vagina with a lint brush and other sex acts.

Counts Three through Six

On February 26, 2016, law enforcement executed a search warrant at **EVANS**'s residence in Essex, Maryland. In addition to other items, law enforcement seized an Apple iPhone 6S Plus, which was located in the master bedroom of the residence. A forensic examination of the cellular phone revealed Kik messages with Victim 1, ~~as well as additional victims~~. Law enforcement discovered messages in which **EVANS** was explicit about the sexual acts he wanted to perform on Victim 1. For example, on December 20, 2016, **EVANS** sent the following message to Victim 1: "It got me so hard I want to come make a video of you getting bent over." **EVANS** continued: "And I'm gonna record me fucking you. And you on top. And you bent over. And me cumming on your face."

In addition, in response to **EVANS**'s requests and with **EVANS**'s encouragement, Victim 1 sent digital videos from her residence in Montgomery County, Maryland of herself masturbating and nude digital videos and images of herself through Kik. The following are examples of videos and images sent from Victim 1 to **EVANS** via Kik, which were stored in **EVANS**'s cellular telephone seized on February 26, 2016, and depict Victim 1 engaged in sexually-explicit conduct, as defined in 18 U.S.C. § 2256(2)(A).

On January 5, 2016, Victim 1 sent **EVANS** a video that is approximately 13 seconds long and depicts a close up of Victim 1's genitalia. In the video, Victim 1 is using the handle of a lint brush to penetrate her vagina.

On January 15, 2016, **EVANS** sent the following Kik messages to Victim 1: "Show me your cookie" and "The one between your legs." In response, Victim 1 sent a photograph depicting her legs spread with a close-up of her vagina.

On January 16, 2016, Victim 1 sent **EVANS** a video that is approximately 9 seconds long and depicts a close up of Victim 1's genitalia. Victim 1 is using the handle of a lint brush to penetrate her vagina.

On February 12, 2016, **EVANS** and Victim 1 exchanged the following Kik messages:

- **EVANS:** lol should do me a video I miss that pussy
- Victim 1: Lmao you do?
- **EVANS:** Yea you miss anything on me lol
- Victim 1: Everything! Lol I miss talking with you
- **EVANS:** Do me a video!!!
- **EVANS:** Since no one is home
- Victim 1: Lol I'll do a pic. Don't want them to find out I'm still talking to you

Thereafter, Victim 1 sends a photograph of her legs spread with a close-up of her vagina. Then, the following conversation ensues:

- **EVANS:** Send that video
- Victim 1: Its not letting seriously lol do you want another pic?
- **EVANS:** Lol take a few

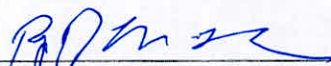
Thereafter, Victim 1 sends a second photograph of her legs spread, with a close-up of her fingers spreading her vagina. **EVANS** responds:

- **EVANS:** It looks better than ever
- **EVANS:** Do you want me in it
- ***
- **EVANS:** Get it wet and do a video
- **EVANS:** Show me how bad

* * *

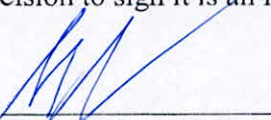
I have read this Statement of Facts and carefully reviewed every part of it with my attorney. I understand it, and I voluntarily agree to it. I do not wish to change any part of it.

4/23/18
Date


Roy David Evans Jr.

I am Roy David Evans Jr.'s attorney. I have carefully reviewed every part of this Statement of Facts with him. To my knowledge, his decision to sign it is an informed and voluntary one.

4/23/18
Date


Andrew Szekely, Esq.